

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Robert J. Lemons

Attorneys for Lehman Brothers Holdings Inc. and
Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
	:	
In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**CERTIFICATE OF NO OBJECTION
UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS
CLAIMS OBJECTIONS SCHEDULED FOR HEARING ON JULY 19, 2012**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), or LBHI as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of LBHI and its Affiliated Debtors (the "Plan Administrator"), filed the following motions

and omnibus claims objections (collectively, the “Claims Objections”) with the Court for hearing on or before July 18, 2012:

- a. Debtors’ Sixty-Third Omnibus Objection to Claims (Valued Derivative Claims) **[ECF No. 11978]**
- b. Debtors’ Sixty-Seventh Omnibus Objection to Claims (Valued Derivative Claims) **[ECF No. 12533]**
- c. Debtors’ Seventy-First Omnibus Objection to Claims (Valued Derivative Claims) **[ECF No. 13230]**
- d. Debtors’ Ninety-Fifth Omnibus Objection to Claims (Valued Derivative Claims) **[ECF No. 14490]**
- e. Debtors’ Two Hundred Twenty-Eighth Omnibus Objection to Claims (No Liability Derivatives Claims) **[ECF No. 20886]**
- f. Debtors’ Two Hundred Thirty-Third Omnibus Objection to Claims (No Liability Derivatives Claims) **[ECF No. 21741]**
- g. Two Hundred Ninety-First Omnibus Objection to Claims (No Liability Derivatives Claims) **[ECF No. 27380]**
- h. Two Hundred Ninety-Second Omnibus Objection to Claims (No Guarantee Claims) **[ECF No. 27381]**
- i. Two Hundred Ninety-Ninth Omnibus Objection to Claims (No Liability Claims) **[ECF No. 27870]**
- j. Three Hundred Fifth Omnibus Objection to Claims (Duplicative Claims) **[ECF No. 28412]**
- k. Three Hundred Sixth Omnibus Objection to Claims (No Liability Claims) **[ECF No. 28422]**
- l. Three Hundred Seventh Omnibus Objection to Claims (Insufficient Documentation Claims) **[ECF No. 28424]**
- m. Three Hundred Eighth Omnibus Objection to Claims (Warrant Claims) **[ECF No. 28425]**
- n. Three Hundred Ninth Omnibus Objection to Claims (Settled Derivatives Claims) **[ECF No. 28427]**
- o. Three Hundred Tenth Omnibus Objection to Claims (Settled Derivatives Claims) **[ECF No. 28428]**

- p. Three Hundred Eleventh Omnibus Objection to Claims (No Liability Derivatives Claims) [ECF No. 28430]
- q. Three Hundred Twelfth Omnibus Objection To Claims (No Liability Claims) [ECF No. 28431]
- r. Three Hundred Fifteenth Omnibus Objection to Claims (No Liability Claims) [ECF No. 28438]
- s. Three Hundred Seventeenth Omnibus Objection to Claims (No Liability LBL Employee Claims) [ECF No. 28441]
- t. Three Hundred Eighteenth Omnibus Objection to Claims (Partnership Claims) [ECF No. 28442]

2. In accordance with the Second Amended Case Management Order, the Debtors, or the Plan Administrator, as applicable, established deadlines (the “Response Deadline”) for each Claim Objection for parties to object or file responses. The Response Deadlines have been extended for certain creditors from time to time. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadlines have now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objections have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Debtors or the Plan Administrator by any of the holders of the claims included Exhibit 1 to any of the Orders attached hereto, which includes only the proofs of claim for which the Claims Objection will be granted. Responses to certain of the Claims Objections were filed on the docket, or served on the Debtors, by holders of certain proofs of claim included on the Claims Objections. The

hearing on the Claims Objections as to any proof of claim for which a response was either filed on the docket or received by the Debtors, and which objection has not been resolved, has been adjourned to a future date.

4. Accordingly, the Debtors and the Plan Administrator respectfully request that the proposed orders granting the Claims Objections annexed hereto as Exhibits A through T, which, except for the inclusion of additional language to indicate that such order is supplemental to a previously entered order for a Claim Objection or to reference the inclusion of separate exhibits attached to the proposed orders for proofs of claim for which the Claims Objection is granted, adjourned or withdrawn, are unmodified since the filing of the Claims Objections, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: July 18, 2012
New York, New York

/s/ Robert J. Lemons
Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Lehman Brothers Holdings Inc. and
Certain of Its Affiliates

EXHIBIT A
(Proposed Order – ECF No. 11978)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
: **LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**
: **Debtors.** : **(Jointly Administered)**
-----X

**FOURTH SUPPLEMENTAL ORDER GRANTING DEBTORS'
SIXTY-THIRD OMNIBUS OBJECTION TO CLAIMS
(VALUED DERIVATIVE CLAIMS)**

Upon the sixty-third omnibus objection to claims, dated October 13, 2010 (the "Sixty-Third Omnibus Objection to Claims"),¹ of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the "Procedures Order"), seeking to reduce, reclassify (in certain instances), clarify (in certain instances), and allow the Valued Derivative Claims on the basis that the amounts listed on the proofs of claim are greater than the fair, accurate, and reasonable values determined by the Debtors after a review of the claimant's supporting documentation and the Debtors' books and records; that the classifications (in certain instances) are improperly identified as secured, administrative expenses or priority claims on claimants' proofs of claim; and that the Debtor against whom the claim is asserted, in certain instances, has been determined by

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Sixty-Third Omnibus Objection to Claims.

the Debtors to be in need of clarification after a review of the claimants' supporting documentation; all as more fully described in the Sixty-Third Omnibus Objection to Claims; and due and proper notice of the Sixty-Third Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the Sixty-Third Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9653]; and it appearing that no other or further notice need be provided; and upon the resolution of the Response of Telecom Italia Finance SA's Response to the Sixty-Third Omnibus Objection to Claims (Valued Derivative Claims) [Docket No. 12951]; and the Court having found and determined that the relief sought in the Sixty-Third Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Sixty-Third Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Sixty-Third Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Valued Derivative Claim listed on Exhibit 1 annexed hereto is hereby modified and allowed in the amount set forth on Exhibit 1 under

the column heading “Modified Amount” and any asserted amount in excess of the modified amount is disallowed; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A to the Sixty-Third Omnibus Objection to Claims that does not appear on Exhibit 1, annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 63: EXHIBIT 1 - VALUED DERIVATIVE CLAIMS

			ASSERTED				MODIFIED		
	NAME	CLAIM #	FILED DATE	CHAPTER 11 ESTATE	CLASS	AMOUNT	CHAPTER 11 ESTATE	CLASS	AMOUNT
1	TELECOM ITALIA FINANCE SA SIEGE SOCIAL ATTN: ANTONIO SICA, DIRECTOR 12, RUE EUGENE RUPPERT L-2453 LUXEMBOURG, B.P. 872, L-2018 LUXEMBOURG	15366	09/17/2009	Lehman Brothers Special Financing Inc.	Unsecured	\$35,752,789.99*	Lehman Brothers Special Financing Inc.	Unsecured	\$35,696,077.01
2	TELECOM ITALIA FINANCE SA SIEGE SOCIAL ATTN: ANTONIO SICA, DIRECTOR 12, RUE EUGENE RUPPERT L-2453 LUXEMBOURG, B.P. 872, L-2018 LUXEMBOURG	15368	09/17/2009	Lehman Brothers Holdings Inc.	Unsecured	\$35,752,789.99*	Lehman Brothers Holdings Inc.	Unsecured	\$35,590,272.35
TOTAL						\$71,505,579.98	TOTAL		\$71,286,349.36

* - Indicates claim contains unliquidated and/or undetermined amounts

EXHIBIT B
(Proposed Order – ECF No. 12533)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
:
Debtors. : **(Jointly Administered)**
-----X

**NINTH SUPPLEMENTAL ORDER GRANTING DEBTORS'
SIXTY-SEVENTH OMNIBUS OBJECTION TO CLAIMS
(VALUED DERIVATIVE CLAIMS)**

Upon the sixty-seventh omnibus objection to claims, dated November 3, 2010 (the "Sixty-Seventh Omnibus Objection to Claims"),¹ of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the "Procedures Order"), seeking to reduce, reclassify (in certain instances), clarify (in certain instances), and allow the Valued Derivative Claims on the basis that the amounts listed on the proofs of claim are greater than the fair, accurate, and reasonable values determined by the Debtors after a review of the claimant's supporting documentation and the Debtors' books and records; that the classifications (in certain instances) are improperly identified as secured, administrative expenses or priority claims on claimants' proofs of claim; and that the Debtor against whom the claim is asserted, in certain instances, has been determined by

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Sixty-Seventh Omnibus Objection to Claims.

the Debtors to be in need of clarification after a review of the claimants' supporting documentation; all as more fully described in the Sixty-Seventh Omnibus Objection to Claims; and due and proper notice of the Sixty-Seventh Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the Sixty-Seventh Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9635]; and it appearing that no other or further notice need be provided; upon the resolution of the Response of CSP II USIS Holdings L.P. [Docket No. 13078]; and the Court having found and determined that the relief sought in the Sixty-Seventh Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Sixty-Seventh Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Sixty-Seventh Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Valued Derivative Claim listed on Exhibit 1 annexed hereto is hereby modified and allowed in the amount set forth on Exhibit 1 under the column heading "Modified Amount"; and any asserted amount in excess of the modified amount are disallowed; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A to the Sixty-Seventh Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 67: EXHIBIT 1 - VALUED DERIVATIVE CLAIMS

ASSERTED							MODIFIED		
	NAME	CLAIM #	FILED DATE	CHAPTER 11 ESTATE	CLASS	AMOUNT	CHAPTER 11 ESTATE	CLASS	AMOUNT
1	CSP II USIS HOLDINGS L.P. C/O THE CARLYLE GROUP ATTN: J. BECZAK 520 MADISON AVENUE, 39TH FLOOR NEW YORK, NY 10022	16198	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$1,574,529.52	Lehman Brothers Holdings Inc.	Unsecured	\$707,852.00
2	CSP II USIS HOLDINGS L.P. C/O THE CARLYLE GROUP ATTN: J. BECZAK 520 MADISON AVENUE, 39TH FLOOR NEW YORK, NY 10022	16199	09/18/2009	Lehman Brothers Special Financing Inc.	Unsecured	\$1,574,529.52	Lehman Brothers Special Financing Inc.	Unsecured	\$707,852.00
TOTAL						\$3,149,059.04	TOTAL		\$1,415,704.00

EXHIBIT C
(Proposed Order – ECF No. 13230)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
: **LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**
: **Debtors.** : **(Jointly Administered)**
-----X

**SECOND SUPPLEMENTAL ORDER GRANTING DEBTORS' SEVENTY-FIRST
OMNIBUS OBJECTION TO CLAIMS (VALUED DERIVATIVE CLAIMS)**

Upon the Seventy-First omnibus objection to claims, dated December 6, 2010 (the "Seventy-First Omnibus Objection to Claims"),¹ of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the "Procedures Order"), seeking to reduce, reclassify (in certain instances), and allow the Valued Derivative Claims on the basis that the amounts listed on the proofs of claim are greater than the fair, accurate, and reasonable values determined by the Debtors after a review of the claimants' supporting documentation and the Debtors' books and records, and that the classifications (in certain instances) are improperly identified as secured, administrative expenses or priority claims on claimants' proofs of claim, all as more fully described in the Seventy-First Omnibus Objection to Claims; and due and proper notice of the Seventy-First Omnibus Objection to Claims having been provided to (i) the U.S. Trustee;

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Seventy-First Omnibus Objection to Claims.

(ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the Seventy-First Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9653]; and it appearing that no other or further notice need be provided; and upon the resolution of the Response of ICCREA Banca S.p.A to Debtors' Seventy-First Omnibus Objection to Claims (Valued Derivative Claims) [Docket No. 13792]; and the Court having found and determined that the relief sought in the Seventy-First Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Seventy-First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Seventy-First Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Valued Derivative Claim listed on Exhibit 1 annexed hereto is hereby modified and allowed in the amount set forth on Exhibit 1 under the column heading "Modified Amount" and any asserted amount in excess of modified amount are disallowed; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A to the Seventy-

First Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and
it is further

ORDERED that this Court shall retain jurisdiction to hear and determine
all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 71: EXHIBIT 1 - VALUED DERIVATIVE CLAIMS

ASSERTED							MODIFIED		
	NAME	CLAIM #	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
1	ICCREA BANCA SPA ATTN: CA LEGAL DEPARTMENT AVV. CLAUDIO CALASCIBETTA VIA LUCREZIA ROMANA 41/47 ROMA, 00178 ITALY	17171	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$11,744,450.25*	Lehman Brothers Holdings Inc.	Unsecured	\$11,425,461.07
2	ICCREA BANCA SPA ATTN: CA LEGAL DEPARTMENT AVV. CLAUDIO CALASCIBETTA VIA LUCREZIA ROMANA 41/47 ROMA, 00178 ITALY	17172	09/18/2009	Lehman Brothers Special Financing Inc.	Unsecured	\$11,744,450.25*	Lehman Brothers Special Financing Inc.	Unsecured	\$11,444,652.82
TOTAL						\$23,488,900.50	TOTAL		\$22,870,113.89

* - Indicates claim contains unliquidated and/or undetermined amounts

EXHIBIT D
(Proposed Order – ECF No. 14490)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
: **LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**
: **Debtors.** : **(Jointly Administered)**
-----X

**THIRD SUPPLEMENTAL ORDER GRANTING DEBTORS' NINETY-FIFTH
OMNIBUS OBJECTION TO CLAIMS (VALUED DERIVATIVE CLAIMS)**

Upon the ninety-fifth omnibus objection to claims, dated February 14, 2011 (the "Ninety-Fifth Omnibus Objection to Claims"),¹ of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the "Procedures Order"), seeking to reduce, reclassify (in certain instances), and allow the Valued Derivative Claims on the basis that the amounts listed on the proofs of claim are greater than the fair, accurate, and reasonable values determined by the Debtors after a review of the claimants' supporting documentation and the Debtors' books and records, and that the classifications (in certain instances) are improperly identified as secured, administrative expenses or priority claims on claimants' proofs of claim, all as more fully described in the Ninety-Fifth Omnibus Objection to Claims; and due and proper notice of the Ninety-Fifth Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Ninety-Fifth Omnibus Objection to Claims.

attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the Ninety-Fifth Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9653]; and it appearing that no other or further notice need be provided; upon the resolution of the Response of LINC-Redondo Beach Seniors, Inc. [Docket No. 15035]; and the Court having found and determined that the relief sought in the Ninety-Fifth Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Ninety-Fifth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Ninety-Fifth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Valued Derivative Claim listed on Exhibit 1 annexed hereto is hereby modified and allowed in the amount set forth on Exhibit 1 under the column heading "Modified Amount" and any asserted amount in excess of the modified amount is disallowed; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A to the Ninety-Fifth Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and

it is further

ORDERED that this Court shall retain jurisdiction to hear and determine
all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 95: EXHIBIT 1 - VALUED DERIVATIVE CLAIMS

ASSERTED							MODIFIED		
	NAME	CLAIM #	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
1	LINC-REDONDO BEACH SENIORS, INC. C/O PENELOPE PARMES, ESQ. RUTAN & TUCKER, LLP 611 ANTON BOULEVARD, FOURTEENTH FLOOR COSTA MESA, CA 92626	4651	05/29/2009	Lehman Brothers Derivative Products Inc.	Unsecured	Undetermined	Lehman Brothers Derivative Products Inc.	Unsecured	\$125,000.00
TOTAL						\$0.00	TOTAL		\$125,000.00

EXHIBIT E
(Proposed Order – ECF No. 20886)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**SUPPLEMENTAL ORDER GRANTING
DEBTORS' TWO HUNDRED TWENTY-EIGHTH OMNIBUS
OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

Upon the two hundred twenty-eighth omnibus objection to claims, dated October 17, 2011 (the "Two Hundred Twenty-Eighth Omnibus Objection to Claims"),¹ of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the "Procedures Order"), seeking disallowance and expungement of the No Liability Derivatives Claims on the grounds that they assert claims for which the Debtors have no liability, all as more fully described in the Two Hundred Twenty-Eighth Omnibus Objection to Claims; and due and proper notice of the Two Hundred Twenty-Eighth Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the Two Hundred Twenty-Eighth Omnibus Objection to Claims; and (vii) all other parties entitled to notice in

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Two Hundred Twenty-Eighth Omnibus Objection to Claims.

accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and the Court having found and determined that the relief sought in the Two Hundred Twenty-Eighth Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Two Hundred Twenty-Eighth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Two Hundred Twenty-Eighth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claim listed on Exhibit 1 annexed hereto is disallowed and expunged in its entirety with prejudice; and it is further

ORDERED that the Debtors have adjourned to August 23, 2012 (or as may be further adjourned by the Debtors) the Two Hundred Twenty-Eighth Omnibus Objection to Claims with respect to the claims listed on Exhibit 2 annexed hereto; and it is further

ORDERED that this Order supersedes all previous orders regarding the No Liability Derivatives Claims listed on Exhibit 1 and Exhibit 2 annexed hereto; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Two Hundred Twenty-Eighth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto, and (ii) any claim listed on Exhibit A annexed to the Two Hundred Twenty-Eighth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed to the *Order Granting Debtors' Two*

Hundred Twenty-Eighth Omnibus Objection to Claims (No Liability Derivatives Claims) [ECF
No. 23076]; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all
matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 228: EXHIBIT 1 - NO LIABILITY DERIVATIVES CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY ATTN: MICHELE KUNITZ 1500 MAIN STREET TS28 SPRINGFIELD, MA 01115	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	23642	\$9,213,965.00*	No Liability Claim - Derivative
TOTAL						\$9,213,965.00	

Exhibit 2

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 228: EXHIBIT 2 - NO LIABILITY DERIVATIVES CLAIMS - ADJOURNED CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	CERBERUS INTERNATIONAL, LTD. C/O LOWENSTEIN SANDLER PC ATTN: ROBERT G. MINION, ESQ & RICHARD BERNSTEIN, ESQ. 1251 AVENUE OF THE AMERICAS, 18TH FLOOR NEW YORK, NY 10020	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	25006	\$4,066,161.48*	No Liability Claim - Derivative
2	CERBERUS INTERNATIONAL, LTD. C/O LOWENSTEIN SANDLER PC 1251 AVENUE OF THE AMERICAS, 18TH FLOOR ATTN: ROBERT G. MINION, ESQ. RICHARD BERNSTEIN, ESQ. NEW YORK, NY 10020	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25009	\$4,066,161.48*	No Liability Claim - Derivative
3	MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY ATTN: MICHELE KUNITZ 1500 MAIN STREET TS28 SPRINGFIELD, MA 01115	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23643	\$9,192,195.00*	No Liability Claim - Derivative
TOTAL						\$17,324,517.96	

EXHIBIT F
(Proposed Order – ECF No. 21741)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**THIRD SUPPLEMENTAL ORDER GRANTING
DEBTORS' TWO HUNDRED THIRTY-THIRD OMNIBUS
OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

Upon the two hundred thirty-third omnibus objection to claims, dated November 8, 2011 (the "Two Hundred Thirty-Third Omnibus Objection to Claims"),¹ of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the "Procedures Order"), seeking disallowance and expungement of the No Liability Derivatives Claims on the grounds that they assert claims for which the Debtors have no liability, all as more fully described in the Two Hundred Thirty-Third Omnibus Objection to Claims; and due and proper notice of the Two Hundred Thirty-Third Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the Two Hundred Thirty-Third Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Two Hundred Thirty-Third Omnibus Objection to Claims.

procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and the Court having found and determined that the relief sought in the Two Hundred Thirty-Third Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Two Hundred Thirty-Third Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Two Hundred Thirty-Third Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claim listed on Exhibit 1 annexed hereto is disallowed and expunged in its entirety with prejudice; and it is further

ORDERED that the Debtors have adjourned to August 23, 2012 (or as may be further adjourned by the Debtors) the Two Hundred Thirty-Third Omnibus Objection to Claims with respect to the claim listed on Exhibit 2 annexed hereto; and it is further

ORDERED that this Order supersedes all previous orders regarding the No Liability Derivatives Claims listed on Exhibit 1 and Exhibit 2 annexed hereto; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Two Hundred Thirty-Third Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto, (ii) any claim listed on Exhibit A annexed to the Two Hundred Thirty-Third Omnibus Objection to Claims that is not listed on Exhibit 1 annexed to the *Order Granting Debtors' Two Hundred Thirty-Third Omnibus Objection to Claims (No Liability Derivatives Claims)* [ECF No. 23665],

(iii) any claim listed on Exhibit A annexed to the Two Hundred Thirty-Third Omnibus Objection to Claims that is not listed on Exhibit 1 annexed to the *Supplemental Order Granting Debtors' Two Hundred Thirty-Third Omnibus Objection to Claims (No Liability Derivatives Claims)* [ECF No. 24669], and (iv) any claim listed on Exhibit A annexed to the Two Hundred Thirty-Third Omnibus Objection to Claims that is not listed on Exhibit 1 annexed to the *Second Supplemental Order Granting Debtors' Two Hundred Thirty-Third Omnibus Objection to Claims (No Liability Derivatives Claims)* [ECF No. 28374]; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 233: EXHIBIT 1 - NO LIABILITY DERIVATIVES CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	C.M. LIFE INSURANCE COMPANY C/O MASSACHUSETTS MUTAL LIFE INSURANCE COMPANY ATTN: MICHELE KUNITZ 1500 MAIN STREET TS28 SPRINGFIELD, MA 01115	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	23644	Undetermined	No Liability Claim - Derivative
TOTAL						\$0.00	

Exhibit 2

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 233: EXHIBIT 2 - NO LIABILITY DERIVATIVES CLAIMS - ADJOURNED OBJECTIONS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	C.M. LIFE INSURANCE COMPANY C/O MASSACHUSETTS MUTAL LIFE INSURANCE COMPANY ATTN: MICHELE KUNITZ 1500 MAIN STREET TS28 SPRINGFIELD, MA 01115	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	23645	Undetermined	No Liability Claim - Derivative
TOTAL						\$0.00	

EXHIBIT G
(Proposed Order – ECF No. 27380)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**SUPPLEMENTAL ORDER GRANTING TWO HUNDRED NINETY-FIRST
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

Upon the two hundred ninety-first omnibus objection to claims, dated April 16, 2012 (the “Two Hundred Ninety-First Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Derivatives Claims on the grounds that they assert claims for which LBHI and Lehman Brothers Special Financing Inc. (together, the “Chapter 11 Estates”) have no liability, all as more fully described in the Two Hundred Ninety-First Omnibus Objection to Claims; and due and proper notice of the Two Hundred Ninety-First Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the claimants listed on Exhibit A attached to the Two Hundred Ninety-First Omnibus

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Two Hundred Ninety-First Omnibus Objection to Claims.

Objection to Claims; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and the Court having found and determined that the relief sought in the Two Hundred Ninety-First Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Two Hundred Ninety-First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Two Hundred Ninety-First Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claim listed on Exhibit 1 annexed hereto is disallowed and expunged in its entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Two Hundred Ninety-First Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto, and (ii) any claim listed on Exhibit A annexed to the Two Hundred Ninety-First Omnibus Objection to Claims that is not listed on Exhibit 1 annexed to the *Order Granting Two Hundred Ninety-First Omnibus Objection to Claims (No Liability Derivatives Claims)* [ECF No. 28458]; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all

matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 291: EXHIBIT 1 - NO LIABILITY DERIVATIVES CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR LEHMAN MORTGAGE TRUST MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2006-6 SUPPLEMENTAL INTEREST TRUST CTLA - STRUCTURED FINANCE ATTN: FERNANDO ACEBEDO NEW YORK, NY 10016	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28780	Undetermined	No Liability Claim - Derivative
TOTAL						\$0.00	

EXHIBIT H
(Proposed Order – ECF No. 27381)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**SECOND SUPPLEMENTAL ORDER GRANTING TWO HUNDRED
NINETY-SECOND OMNIBUS OBJECTION TO CLAIMS (NO GUARANTEE CLAIMS)**

Upon the two hundred ninety-second omnibus objection to claims, dated April 16, 2012 (the “Two Hundred Ninety-Second Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Guarantee Claims on the grounds that such claims are unenforceable against, and impose no liability on, LBHI, all as more fully described in the Two Hundred Ninety-Second Omnibus Objection to Claims; and due and proper notice of the Two Hundred Ninety-Second Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the claimants listed on Exhibit A attached to the Two Hundred Ninety-Second Omnibus Objection to Claims; and (vi) all other parties entitled

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Two Hundred Ninety-Second Omnibus Objection to Claims.

to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Two Hundred Ninety-Second Omnibus Objection to Claims is in the best interests of LBHI, its estate, creditors, and all parties in interest and that the legal and factual bases set forth in the Two Hundred Ninety-Second Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Two Hundred Ninety-Second Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claim listed on Exhibit 1 annexed hereto is disallowed and expunged in its entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Two Hundred Ninety-Second Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto, (ii) any claim listed on Exhibit A annexed to the Two Hundred Ninety-Second Omnibus Objection to Claims that is not listed on Exhibit 1 annexed to the *Order Granting Two Hundred Ninety-Second Omnibus Objection to Claims (No Guarantee Claims)* [ECF No. 28340], and (iii) any claim listed on Exhibit A annexed to the Two Hundred Ninety-Second Omnibus Objection to Claims that is not listed on Exhibit 1 annexed to the *Supplemental Order Granting Two Hundred Ninety-Second Omnibus Objection to Claims (No Guarantee Claims)* [ECF No. 29117]; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all
matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 292: EXHIBIT 1 - NO GUARANTEE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	HSBC BANK USA, NA AS TTEE FOR LEHMAN MORTGAGE TRUST MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2006-6 SUPPLEMENTAL INTEREST TRUST CTLA- STRUCTURED FINANCE ATTN: CHI LE 10 EAST 40TH STREET, 14TH FLOOR NEW YORK, NY 10016	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28379	Undetermined	No Guarantee Claim
TOTAL						\$0.00	

EXHIBIT I
(Proposed Order – ECF No. 27870)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**SUPPLEMENTAL ORDER GRANTING THE TWO HUNDRED
NINETY-NINTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the two hundred ninth omnibus objection to claims, dated May 14, 2012 (the “Two Hundred Ninety-Ninth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator (the “Plan Administrator”) under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Claims to the extent that they assert claims for which the applicable Chapter 11 Estates do not have any liability, all as more fully described in the Two Hundred Ninety-Ninth Omnibus Objection to Claims; and due and proper notice of the Two Hundred Ninety-Ninth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Two Hundred Ninety-Ninth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Two Hundred Ninety-Ninth Omnibus Objection to Claims.

creditors, and all parties in interest and that the legal and factual bases set forth in the Two Hundred Ninety-Ninth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Two Hundred Ninety-Ninth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto (collectively, the “No Liability Claims”) are disallowed and expunged, with prejudice, to the extent set forth therein; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Two Hundred Ninety-Ninth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto, (ii) any claim listed on Exhibit A annexed to the Two Hundred Ninety-Ninth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed to the *Order Granting the Two Hundred Ninety-Ninth Omnibus Objection to Claims (No Liability Claims)* [ECF No. 29115], and (iii) the portion of any No Liability Claim that is not the subject of the Two Hundred Ninety-Ninth Omnibus Objection to Claims; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 299: EXHIBIT 1 - NO LIABILITY CLAIMS

	Name of Claimant	Case Number	DEBTOR NAME	Claim #	Claim Amount	Reason for Proposed Disallowance	Basis for No Liability
1	AON CONSULTING ATTN: JESSICA SMITH 1100 REYNOLDS BLVD. WINSTON SALEM, NC 27105	08-13555 (JMP)	Lehman Brothers Holdings Inc.	7017	\$283,667.50	No Liability Claim	Claim 7017 identifies Lehman Brothers Inc., a domestic affiliate of the Debtors that is not a Debtor in these jointly administered chapter 11 cases, as the entity liable under the claim.
2	BG BAU BERUFSGENOSSENSCHAFT DER BAUWIRTSCHAFT LORISTRASSE 8 MUNICH, 80335 GERMANY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	44522	\$372,607.96	No Liability Claim	Claim 44522 asserts a claim based on LBHI's purported guarantee of a deposit contract between claimant and Lehman Brothers Bankhaus AG. The claimant does not provide any basis or support for the guarantee claim and LBHI does not have any liability for the underlying contract. Furthermore, Claim 44522 is for unmatured interest, which is disallowed pursuant to Section 502(b)(2) of the Bankruptcy Code.
3	DEUTSCHE BANK AG, LONDON BRANCH ATTN: MICHAEL SUTTON AND ALEXANDER KRAEMER 1 GREAT WINCHESTER STREET LONDON, EC2N 2DB UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	17754	Undetermined	No Liability Claim	The security underlying the portion of Claim 17754 relating to CUSIP 524908EC0 has matured and prepetition LBHI satisfied all obligations on such security. The remaining portion of Claim 17754 is not being expunged pursuant to this Objection and is not affected by this Objection. All rights with respect to the remaining portion of Claim 17754 are reserved.
				TOTAL	\$656,275.46		

EXHIBIT J
(Proposed Order – ECF No. 28412)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**ORDER GRANTING THREE HUNDRED FIFTH
OMNIBUS OBJECTION TO CLAIMS (DUPLICATIVE CLAIMS)**

Upon the three hundred fifth omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Fifth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, in accordance with section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking disallowance and expungement of the duplicative claims on the grounds that such claims are duplicative of the corresponding surviving claims, either exactly or in substance, all as more fully described in the Three Hundred Fifth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Fifth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Fifth Omnibus Objection to

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Fifth Omnibus Objection to Claims.

Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Three Hundred Fifth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Fifth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto under the heading “*Claims to be Disallowed and Expunged*” (collectively, the “Duplicative Claims”) are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the claims listed on Exhibit 1 annexed hereto under the heading “*Surviving Claims*” (collectively, the “Surviving Claims”) will remain on the claims register subject to the Plan Administrator’s right to object as set forth herein; and it is further

ORDERED that this Order supersedes all previous orders regarding the disposition of the Duplicative Claims listed on Exhibit 1 annexed hereto; and it is further

ORDERED that all information included on and all documentation filed in support of any Duplicative Claims, including, but not limited to, derivative and guarantee questionnaires and supporting documentation, shall be treated as having been filed in support of the corresponding Surviving Claims; and it is further

ORDERED that nothing in this Order or the disallowance and expungement of the Duplicative Claims constitutes any admission or finding with respect

to any of the Surviving Claims, and the Plan Administrator's rights to object to the Surviving Claims on any basis are preserved; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Three Hundred Fifth Omnibus Objection to Claims under the heading "*Claims to be Disallowed and Expunged*" that is not listed on Exhibit 1 annexed hereto and (ii) any Surviving Claim; *provided, however*, that if the Court subsequently orders that a Surviving Claim is not appropriately duplicative of the corresponding Duplicative Claim, then the claims agent shall be authorized and directed to immediately reinstate such Duplicative Claim in these chapter 11 cases (the "Reinstated Claim"), and the rights of all interested parties with respect to the Reinstated Claim shall be expressly reserved; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 305: EXHIBIT 1 - DUPLICATIVE CLAIMS

CLAIMS TO BE DISALLOWED AND EXPUNGED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
1	BANK OF EAST ASIA LTD ATTN:CORPORATE LENDING #AMPER SYNDICATION DEPT THE BANK OF E ASIA, LTD 18/E, BANK OF E ASIA BLDG 10 DES VOEUX RD HONG KONG	09/11/2009	08-13555 (JMP)	11500	\$90,000,000.00	GFA I LLC TRANSFEROR: GOLDMAN, SACHS & CO. C/O ASHURST LLP, ATTN: AMANDA GOEHRING TIMES SQUARE TOWER, 7 TIMES SQUARE NEW YORK, NY 10036 TRANSFERRED TO: LEHMAN BROTHERS SPECIAL FINANCING INC. C/O WILLIAM J. FOX TRANSFEROR: BERYL FINANCE LIMITED SERIES 2005-4 LEHMAN BROTHERS HOLDINGS INC. 1271 AVENUE OF THE AMERICAS; 40TH FLOOR NEW YORK, NY 10020 GFA I LLC TRANSFEROR: GOLDMAN, SACHS & CO. C/O ASHURST LLP, ATTN: AMANDA GOEHRING TIME SQUARE TOWER, 7 TIMES SQUARE NEW YORK, NY 10036	10/30/2009	08-13555 (JMP)	58094	\$50,436,511.60
							10/30/2009	08-13555 (JMP)	58091	\$40,041,066.67

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 305: EXHIBIT 1 - DUPLICATIVE CLAIMS

CLAIMS TO BE DISALLOWED AND EXPUNGED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS	NAME	DATE FILED	CASE NUMBER	CLAIM #	TOTAL CLAIM DOLLARS
2	LEHMAN BROTHERS JAPAN INC TRANSFEROR: LEHMAN BROTHERS INTERNATIONAL (EUROPE) (IN ADMINISTRATION) ROPPONGI HILLS MORI TOWER 37F ATTENTION: MASAKI KANEHYO 6-10-1 ROPPONGI, MINATO-KU TOKYO, 106-6137,	11/02/2009	08-13555 (JMP)	62783 ¹	\$19,243,076.00	LEHMAN BROTHERS JAPAN INC. ATTN: KUMIKO KATO, JULIE GREENALL-OTA ROPPONGI HILLS MORI TOWER, 6-10-1 ROPPONGI, MINATO-KU TOKYO, 106-6137 JAPAN	10/29/2009	08-13555 (JMP)	55723	\$4,790,391.00
TOTAL					\$109,243,076.00					

¹ Claim 62783 is being expunged solely with respect to the \$19,243,076.00 portion of the claim that is owned by Lehman Brothers Japan Inc. The remaining portion of Claim 62783 is not being expunged pursuant to this Objection and is not affected by this Objection. All rights with respect to the remaining portion of Claim 62783 are reserved.

EXHIBIT K
(Proposed Order – ECF No. 28422)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**ORDER GRANTING THE THREE HUNDRED SIXTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the three hundred sixth omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Sixth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Claims on the basis that they assert claims for which the applicable Chapter 11 Estates do not have any liability, all as more fully described in the Three Hundred Sixth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Sixth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Sixth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Sixth Omnibus Objection to Claims.

set forth in the Three Hundred Sixth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Three Hundred Sixth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the Three Hundred Sixth Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 306: EXHIBIT 1 - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	CLAIM #	TOTAL CLAIM DOLLARS	BASIS FOR NO LIABILITY
1	ACI WORLDWIDE (MA) 6060 COVENTRY DRIVE ELKHORN, NE 68022-6482	08-13555 (JMP)	Lehman Brothers Holdings Inc.	24961	\$223,464.37	Claim 24961 identifies Lehman Brothers Bank FSB (now known as Aurora Bank FSB), a non-Debtor entity, as the entity liable under the claim.
2	ACTIV FINANCIAL SYSTEMS, INC.* 125 SOUTH WACKER DRIVE, SUITE 2325 CHICAGO, IL 60606		Lehman No Case Asserted/All Cases Asserted	6085	\$30,850.75	Claim 6085 is based on a transaction between claimant and Lehman Brothers Inc. LBHI has no liability to claimant relative to such transaction.
3	AMM'S LIMOUSINE SERVICE, INC. 4320 DI PAOLO CENTER GLENVIEW, IL 60025-5201	08-13555 (JMP)	Lehman Brothers Holdings Inc.	4701	\$4,790.99	Claim 4701 is based on a transaction between claimant and Lehman Brothers Inc. LBHI has no liability to claimant relative to such transaction.
4	CHIMNEY ROCK WINERY LLC MICHAEL BRAGA 5350 SILVERADO TRAIL NAPA, CA 94559	08-13555 (JMP)	Lehman Brothers Holdings Inc.	582	\$8,072.00	Claim 582 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant relative to such transaction or transactions.
5	CIBER, INC 6363 S FIDDLERS GREEN CIR STE 1400 ENGLEWOOD, CO 801115024	08-13555 (JMP)	Lehman Brothers Holdings Inc.	7080	\$1,395.73	Claim 7080 identifies Aurora Loan Services, Inc. (now known as Aurora Loan Services, LLC), a non-Debtor entity, as the entity liable under the claim.
6	CLAREN ROAD CREDIT MASTER FUND, LTD C/O SEWARD & KISSEL LLP ATTN: JUSTIN SHEARER, ESQ ONE BATTERY PARK PLAZA NEW YORK, NY 10004-1485	08-13555 (JMP)	Lehman Brothers Holdings Inc.	33474	\$10,410,000.00	Claim 33474 is for unmatured interest, which is disallowed pursuant to Section 502(b)(2) of the Bankruptcy Code.
7	DAVIS LANDSCAPING, LTD. ASHLEY WILSON VALLEYCREST COMPANIES 24151 VENTURA BLVD CALABASAS, CA 91302	08-13555 (JMP)	Lehman Brothers Holdings Inc.	4740	\$15,000.00	Claim 4740 is based on a transaction or transactions between claimant and a non-Debtor entity. LBHI has no liability to claimant relative to such transaction or transactions.

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 306: EXHIBIT 1 - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	CLAIM #	TOTAL CLAIM DOLLARS	BASIS FOR NO LIABILITY
8	ENERGY SERVICES GROUP INC PO BOX 545 ROCKLAND, MA 02370	08-13885 (JMP)	Lehman Brothers Commodity Services Inc.	6645	\$89,125.00	Claim 6645 identifies Lehman Power Services LLC, a non-Debtor entity, as the entity liable under the claim.
9	FOUR SEASONS SILICON VALLEY ATTN: EVA HAKOVA, ASST. DIR OF FINANCE 2050 UNIVERSITY AVENUE PALO ALTO, CA 94303	08-13555 (JMP)	Lehman Brothers Holdings Inc.	6164	\$40,549.46	Claim 6164 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant relative to such transaction or transactions.
10	GELBER GROUP, LLC ATTN: ACCOUNTING DEPT. 141 W. JACKSON BLVD., STE. 2100A CHICAGO, IL 60604	08-13555 (JMP)	Lehman Brothers Holdings Inc.	3159	\$158,622.95	Claim 3159 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant relative to such transaction or transactions.
11	GEOTEXT TRANSLATIONS, INC. 259 W 30TH STREET, 17TH FLOOR NEW YORK, NY 10001	08-13555 (JMP)	Lehman Brothers Holdings Inc.	1336	\$44,778.59	Claim 1336 is based on a transaction or transactions between claimant and LBAYK. LBHI has no liability to claimant relative to such transaction or transactions.
12	HAYNSWORTH SINKLER BOYD P.A. STANLEY H. MCGUFFIN, ESQ. PO BOX 11889 COLUMBIA, SC 29201	08-13555 (JMP)	Lehman Brothers Holdings Inc.	4203	\$31,969.90	Claim 4203 is based on a transaction or transactions between claimant and an entity other than LBHI. LBHI has no liability to claimant relative to such transaction or transactions.
13	INCONIT CORPORATION 1162 CAMINO VALLECITO LAFAYETTE, CA 94549	08-13555 (JMP)	Lehman Brothers Holdings Inc.	76	\$43,444.29	Claim 76 identifies Lehman Brothers Inc., a domestic affiliate of the Debtors that is not a Debtor in these jointly administered chapter 11 cases, as the entity liable under the claim.
14	LAW OFFICES OF FRANCES C. BERGER 225 BROADWAY STE 1610 NEW YORK, NY 10007-3760	08-13555 (JMP)	Lehman Brothers Holdings Inc.	3780	\$57,288.20	Claim 3780 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant relative to such transaction or transactions.

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 306: EXHIBIT 1 - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	CLAIM #	TOTAL CLAIM DOLLARS	BASIS FOR NO LIABILITY
15	LONDON BUSINESS SCHOOL TRADING COMPANY L REGENT'S PARK LONDON, NW1 4SA UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10354	\$84,614.40	Claim 10354 identifies Lehman Brothers Holdings Plc, a foreign affiliate of the Debtors that is not Debtor in these jointly administered chapter 11 cases, as the entity liable under the claim.
16	LOUISIANA CITIZENS PROPERTY INSURANCE CORPORATION 433 METAIRIE ROAD, SUITE 600 METAIRIE, LA 70005		Lehman No Case Asserted/All Cases Asserted	36856	\$2,587,212.95	Claim 36856 identifies Lehman Re Ltd, a foreign affiliate of the Debtors that is not Debtor in these jointly administered chapter 11 cases, as the entity liable under the claim.
17	MAINE, JOHN DAVENPORT 63 WEST SHORE ROAD BELVEDERE, CA 94920	08-13555 (JMP)	Lehman Brothers Holdings Inc.	3553	\$99,922.55	Claim 3553 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant relative to such transaction or transactions.
18	MICHIGAN TOBACCO SETTLEMENT FINANCE AUTHORITY PO BOX 30754 LANSING, MI 48909	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	14803	\$4,772,320.00	Claim 14803 asserts a claim based on that certain reserve fund agreement. The claimant is not a signatory of or a party to that certain reserve fund agreement, and as such, LBSF is not liable to the claimant under the agreement.
19	MICHIGAN TOBACCO SETTLEMENT FINANCE AUTHORITY PO BOX 30754 LANSING, MI 48909	08-13555 (JMP)	Lehman Brothers Holdings Inc.	14804	\$4,772,320.00	Claim 14804 asserts a claim based on that certain reserve fund agreement. The claimant is not a signatory of or a party to that certain reserve fund agreement, and as such, LBHI is not liable to the claimant under the agreement.
20	MITSUI COMPANY 14-32 AKASAKA 2 CHOME MINATO-KU TOKYO, 107-0052 JAPAN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	67195	\$6,880.00	Claim 67195 identifies Lehman Re Ltd, a foreign affiliate of the Debtors that is not a Debtor in these jointly administered chapter 11 cases, as the entity liable under the claim.

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 306: EXHIBIT 1 - NO LIABILITY CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	CLAIM #	TOTAL CLAIM DOLLARS	BASIS FOR NO LIABILITY
21	NETALYTICS C/O ISDA 360 MADISON AVENUE, 16TH FLOOR NEW YORK, NY 10017		Lehman No Case Asserted/All Cases Asserted	18220	\$33,000.00	Claim 18220 identifies Lehman Brothers Inc., a domestic affiliate of the Debtors that is not a Debtor in these jointly administered chapter 11 cases, as the entity liable under the claim.
22	PELLERANO & HERRERA J F KENNEDY 4TH FLOOR SANTO DOMINGO APARTADO POSTAL 20682 DOM, DOMINICAN REPUBLIC	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11083	\$31,461.08	Claim 11083 is based on a transaction or transactions between claimant and an entity other than LBHI. LBHI has no liability to claimant relative to such transaction or transactions.
23	RIGHT MANAGEMENT, INC. ATTN: PRINCE ALTEE THOMAS, ESQ. FOX ROTHSCHILD LLP 200 MARKET STREET, 10TH FLOOR PHILADELPHIA, PA 19103-3291	08-13555 (JMP)	Lehman Brothers Holdings Inc.	5504	\$79,200.00	Claim 5504 identifies Lehman Brothers Inc., a domestic affiliate of the Debtors that is not a Debtor in these jointly administered chapter 11 cases, as the entity liable under the claim.
24	TARRYTOWN HOUSE 49 EAST SUNNYSIDE LANE PO BOX 222 TARRYTOWN, NY 10591	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9559	\$50,711.49	Claim 9559 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant relative to such transaction or transactions.
25	VIEIRA DE ALMEIDA & ASSOCIADOS MOURINHO DE SILVEIRA 10 LISBON, 125-0167 PORTUGAL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	6188	\$31,695.75	Claim 6188 identifies Lehman Brothers International (Europe), a foreign affiliate of the Debtors that is not Debtor in these jointly administered chapter 11 cases, as the entity liable under the claim.
26	WINNING MIND, LLC 1010 UNIVERSITY AVE., #265 SAN DIEGO, CA 92103	08-13555 (JMP)	Lehman Brothers Holdings Inc.	1428	\$20,695.62	Claim 1428 is based on a transaction or transactions between claimant and Lehman Brothers Inc. LBHI has no liability to claimant relative to such transaction or transactions.
TOTAL					\$23,729,386.07	

EXHIBIT L
(Proposed Order – ECF No. 28424)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THREE HUNDRED SEVENTH OMNIBUS
OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)**

Upon the three hundred seventh omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Seventh Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking to disallow and expunge the Insufficient Documentation Claims, all as more fully described in the Three Hundred Seventh Omnibus Objection to Claims; and due and proper notice of the Three Hundred Seventh Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Seventh Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Three Hundred Seventh Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Seventh Omnibus Objection to Claims.

ORDERED that the relief requested in the Three Hundred Seventh Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Three Hundred Seventh Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 307: EXHIBIT 1 - INSUFFICIENT DOCUMENTATION CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	ENERGIE BADEN-WURTTMBERG AG ATTN: MICHAEL RUMMER DURLACHER ALLEE 93 KARLSRUHE, D-76131 GERMANY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	29904	Undetermined	Insufficient Documentation Claim
2	HSBC BANK USA NATIONAL ASSOCIATION, AS TRUSTEE FOR RESTRUCTURED ASSET CERTIFICATES WITH ENHANCED RETURNS SERIES 2001-13- C CTLA STRUCTURED FINANCE ATTN: CHI S. LE 10 EAST 40TH ST 14TH FLOOR NEW YORK, NY 10016	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28788	Undetermined	Insufficient Documentation Claim
3	HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR RESTRUCTURED ASSET CERTIFICATES WITH ENHANCED RETURNS SERIES 2001-13- C CTLA STRUCTURED FINANCE ATTN: CHI S. LE 10 EAST 40TH STREET 14TH FLOOR NEW YORK, NY 10016	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28787	Undetermined	Insufficient Documentation Claim
4	LEVACHAMIS S.A. VICTOR LEVY AV. ANACOANA # 35 (CARIB) APTO. 14 SANTO DOMINGO, DOMINICAN REPUBLIC	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/10/2008	583	\$65,540.16	Insufficient Documentation Claim

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 307: EXHIBIT 1 - INSUFFICIENT DOCUMENTATION CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
5	TURING FOUNDATION C/O PATTERSON BELKNAP WEBB & TYLER LLP ATTN: DANIEL A. LOWENTHAL 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036-6710	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30604	Undetermined	Insufficient Documentation Claim
6	WESTSANT AG C/O PATTERSON BELKNAP WEBB & TYLER LLP ATTN: DANIEL A. LOWENTHAL 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036-6710	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30625	Undetermined	Insufficient Documentation Claim
TOTAL						\$65,540.16	

EXHIBIT M
(Proposed Order – ECF No. 28425)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THE THREE HUNDRED EIGHTH
OMNIBUS OBJECTION TO CLAIMS (WARRANT CLAIMS)**

Upon the three hundred eighth omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Eighth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking to reduce and allow the Warrant Claims on the basis that the amounts listed on the proofs of claim are greater than the fair, accurate, and reasonable values determined by the Plan Administrator after a review of the claimants’ supporting documentation and LBHI’s books and records, all as more fully described in the Three Hundred Eighth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Eighth Omnibus Objection to Claims having been provided; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Eighth Omnibus Objection to Claims is in the best interests of LBHI, its creditors, and

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Eighth Omnibus Objection to Claims.

all parties in interest, and that the legal and factual bases set forth in the Three Hundred Eighth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Eighth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Warrant Claim listed on Exhibit 1 annexed hereto is reduced and allowed in the amount set forth on Exhibit 1 under the column heading “*Modified Amount*,” and any asserted amounts in excess of the reduced amount are disallowed; and it is further

ORDERED that this Order has no res judicata, estoppel, or other affect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A to the Three Hundred Eighth Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)**OMNIBUS OBJECTION 308: EXHIBIT 1 - PROOFS OF CLAIM TO BE REDUCED AND ALLOWED**

			ASSERTED				MODIFIED		
	NAME	CLAIM #	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
1	BECKER, DAVID A.	28301	09/22/2009	Lehman Brothers Holdings Inc.	Unsecured	\$229,349.90	Lehman Brothers Holdings Inc.	Unsecured	\$186,704.57
2	BIEBER, SANDER M. AND LINDA E. ROSENZWEIG 3217 FARMINGTON DRIVE CHEVY CHASE, MD 20815	15385	09/17/2009	Lehman Brothers Holdings Inc.	Unsecured	Undetermined	Lehman Brothers Holdings Inc.	Unsecured	\$100,883.52
3	CASE, JOHN 153 DOSORIS LANE GLEN COVE, NY 11542	16248	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	Undetermined	Lehman Brothers Holdings Inc.	Unsecured	\$168,139.20
4	ESTATE OF HAROLD SNYDER 555 MADISON AVE STE 1302 NEW YORK, NY 10022- 3406	18629	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$388,209.90	Lehman Brothers Holdings Inc.	Unsecured	\$313,259.57
5	LANGER INVESTMENT PARTNERS 5144 E. PALOMINO ROAD PHOENIX, AZ 85018	15406	09/17/2009	Lehman Brothers Holdings Inc.	Unsecured	Undetermined	Lehman Brothers Holdings Inc.	Unsecured	\$168,139.20
6	LESLIE STEPPEL WEISBROD TRUST DTD 6/27/1990 369 WHIPPOORWILL ROAD CHAPPAQUA, NY 10514	19325	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$160,501.90	Lehman Brothers Holdings Inc.	Unsecured	\$130,658.17

LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)**OMNIBUS OBJECTION 308: EXHIBIT 1 - PROOFS OF CLAIM TO BE REDUCED AND ALLOWED**

			ASSERTED				MODIFIED		
	NAME	CLAIM #	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
7	LESLIE STEPPEL WEISBROD TRUST DTD 6/27/1990 369 WHIPPOORWILL ROAD CHAPPAQUA, NY 10514	19378	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$114,778.00	Lehman Brothers Holdings Inc.	Unsecured	\$88,588.50
8	LIGHTEN, WILLIAM E.	28231	09/22/2009	Lehman Brothers Holdings Inc.	Unsecured	\$183,307.80*	Lehman Brothers Holdings Inc.	Unsecured	\$149,223.54
9	MCGEE III, HUGH E	31078	09/22/2009	Lehman Brothers Holdings Inc.	Unsecured	\$229,349.90	Lehman Brothers Holdings Inc.	Unsecured	\$186,704.57
10	MCGEE, HUGH	31079	09/22/2009	Lehman Brothers Holdings Inc.	Unsecured	\$133,484.00	Lehman Brothers Holdings Inc.	Unsecured	\$101,244.00
11	SHEHADI, FREDERICK S. JR. 4000 GULFSHORE BLVD N. # 300 NAPLES, FL 34103-3428	15756	09/17/2009	Lehman Brothers Holdings Inc.	Unsecured	\$81,986.40	Lehman Brothers Holdings Inc.	Unsecured	\$63,277.50
12	SNYDER, BERYL 555 MADISON AVE STE 1302 NEW YORK, NY 10022- 3106	18631	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$155,197.90	Lehman Brothers Holdings Inc.	Unsecured	\$125,233.77
13	SNYDER, BRIAN 555 MADISON AVE STE 1302 NEW YORK, NY 10022- 3406	18630	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$155,197.90	Lehman Brothers Holdings Inc.	Unsecured	\$125,233.77

* - Indicates claim contains unliquidated and/or undetermined amounts

LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)**OMNIBUS OBJECTION 308: EXHIBIT 1 - PROOFS OF CLAIM TO BE REDUCED AND ALLOWED**

			ASSERTED			MODIFIED			
	NAME	CLAIM #	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
14	SNYDER, JAY 555 MADISON AVE STE 1302 NEW YORK, NY 10022- 3406	18651	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$155,197.90	Lehman Brothers Holdings Inc.	Unsecured	\$125,233.77
15	TELLING, DR. FRED W 2068 COUNTRY CLUB DRIVE PORT ORANGE, FL 32128 TRANSFERRED TO: TELLING, DR. FRED W 2068 COUNTRY CLUB DRIVE PORT ORANGE, FL 32128 TRANSFERRED TO: TELLING, DR. FRED W 2068 COUNTRY CLUB DRIVE PORT ORANGE, FL 32128	3962	04/27/2009	Lehman Brothers Holdings Inc.	Unsecured	\$196,760.15	Lehman Brothers Holdings Inc.	Unsecured	\$151,866.00
16	VLASIC INVESTMENTS, L.L.C. C/O MICHAEL A. VLASIC 38710 NORTH WOODWARD SUITE 100 BLOOMFIELD HILLS, MI 48304	16331	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$517,591.90	Lehman Brothers Holdings Inc.	Unsecured	\$439,076.75

LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)**OMNIBUS OBJECTION 308: EXHIBIT 1 - PROOFS OF CLAIM TO BE REDUCED AND ALLOWED**

			ASSERTED				MODIFIED		
	NAME	CLAIM #	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
17	WARD, KEVIN A. (ID 4000001738) C/O MARK E. LEIPOLD GOULD & RATNER LLP 222 N. LASALLE ST., STE 800 CHICAGO, IL 60601	40502	10/15/2009	Lehman Brothers Holdings Inc.	Unsecured	\$91,653.90	Lehman Brothers Holdings Inc.	Unsecured	\$74,611.77
18	WECKER, JEFFREY	29718 ¹	09/22/2009	Lehman Brothers Holdings Inc.	Unsecured	Undetermined	Lehman Brothers Holdings Inc.	Unsecured	\$74,611.77
TOTAL						\$2,792,567.45	TOTAL		\$2,772,689.94

¹ Only the portion of Claim 29718 relating to the security identified by ISIN 52520W143 is subject to the Three Hundred Eighth Omnibus Objection to Claims. All other claim components that are not already expunged may remain active on the claims register, subject to the Plan Administrator's rights to object to any remaining portions of Claim 29718.

EXHIBIT N
(Proposed Order – ECF No. 28427)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THREE HUNDRED NINTH OMNIBUS
OBJECTION TO CLAIMS (SETTLED DERIVATIVES CLAIMS)**

Upon the three hundred ninth omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Ninth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), in accordance with section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking disallowance and expungement of the Settled Derivatives Claims on the grounds that the Settled Derivatives Claims are contrary to settlements that the parties have entered into, all as more fully described in the Three Hundred Ninth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Ninth Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) each claimant listed on Exhibit A attached to the Three Hundred Ninth Omnibus Objection to Claims; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010,

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Ninth Omnibus Objection to Claims.

governing case management and administrative procedures for these cases [ECF No. 9635]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Ninth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Three Hundred Ninth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Ninth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Settled Derivatives Claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the objections to the claims listed on Exhibit 2 annexed hereto are withdrawn without prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the Three Hundred Ninth Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 309: EXHIBIT 1 - SETTLED DERIVATIVES CLAIMS

	NAME	CASE NUMBER	CHAPTER 11 ESTATE	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	ATTORNEYS' LIABILITY ASSURANCE SOCIETY, INC. C/O RICHARD CULL, LEGAL COUNSEL AUGUSTUS ASSET MANAGERS LIMITED 12 ST. JAMES'S PLACE LONDON, SW1A 1NX UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25884	\$350,569.00	No Liability - Derivative Settled
2	EAST BAY MUNICIPAL UTILITY DISTRICT ATTN: GARY BREAU, DIRECTOR OF FINANCE 375 ELEVENTH STREET, MS 801 OAKLAND, CA 94607	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	26497	\$144,705.25	No Liability - Derivative Settled
3	EAST BAY MUNICIPAL UTILITY DISTRICT 375 ELEVENTH STREET, MS 801 ATTN: GARY BREAU, DIRECTOR OF FINANCE OAKLAND, CA 94607	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32175	\$144,705.25	No Liability - Derivative Settled
4	JULIUS BAER MULTIBOND SICAV - LOCAL EMERGING BOND FUND C/O RICHARD CULL, LEGAL COUNSEL AUGUSTUS ASSET MANAGERS LIMITED 12 ST. JAMES'S PLACE LONDON, SW1A 1NX UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25891	\$17,684,225.00	No Liability - Derivative Settled

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 309: EXHIBIT 1 - SETTLED DERIVATIVES CLAIMS

	NAME	CASE NUMBER	CHAPTER 11 ESTATE	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
5	NEWS AMERICA INCORPORATED C/O RICHARD CULL, LEGAL COUNSEL AUGUSTUS ASSET MANAGERS LIMITED 12 ST. JAMES'S PLACE LONDON, SW1A 1NX UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25887	\$522,631.00	No Liability - Derivative Settled
6	PACIFICCORP RETIREMENT PLAN C/O RICHARD CULL, LEGAL COUNSEL AUGUSTUS ASSET MANAGERS LIMITED 12 ST. JAMES'S PLACE LONDON, SW1A 1NX UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25889	\$476,828.00	No Liability - Derivative Settled
TOTAL						\$19,323,663.50	

Exhibit 2

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 309: EXHIBIT 2 - SETTLED DERIVATIVES CLAIMS - WITHDRAWN OBJECTIONS

	NAME	CASE NUMBER	CHAPTER 11 ESTATE	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	BERYL FINANCE LIMITED SERIES 2007-15 C/O THE BANK OF NEW YORK MELLON-LONDON BRANCH ATTN: SANAJAY JOBANPUTRA-VP, GLOBAL CORP. TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17471	Undetermined	No Liability - Derivative Settled
2	BERYL FINANCE LIMITED SERIES 2007-15 C/O THE BANK OF NEW YORK MELLON-LONDON BRANCH ATTN: SANAJAY JOBANPUTRA-VP, GLOBAL CORP. TRUST ONE CANADA SQUARE LONDON, E14 5AL UNITED KINGDOM	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17473	Undetermined	No Liability - Derivative Settled
TOTAL						\$0.00	

EXHIBIT O
(Proposed Order – ECF No. 28428)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THREE HUNDRED TENTH OMNIBUS
OBJECTION TO CLAIMS (SETTLED DERIVATIVES CLAIMS)**

Upon the three hundred tenth omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Tenth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”) for the entities in the above-referenced chapter 11 cases (together, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to revalue and allow the Settled Derivatives Claims on the grounds that the Chapter 11 Estates and claimants have agreed upon a claim amount that is not currently reflected on claimants’ proofs of claim, all as more fully described in the Three Hundred Tenth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Tenth Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) each claimant listed on Exhibit A attached to the

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Tenth Omnibus Objection to Claims.

Three Hundred Tenth Omnibus Objection to Claims; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Tenth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Three Hundred Tenth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Tenth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Settled Derivatives Claim listed on Exhibit 1 annexed hereto is hereby modified and allowed in the amount that is set forth on Exhibit 1 under the column heading “*Modified Amount*”; *provided that*, the holder of a Settled Derivatives Claim against both (i) a Chapter 11 Estate based on a derivatives contract and (ii) LBHI based on its guarantee relating to that derivatives contract may not receive an aggregate recovery in respect of the Settled Derivatives Claim that is greater than the applicable “*Modified Amount*”; and it is further

ORDERED that (i) the “*Modified Amount*” sets forth the total amount due to the claimant under, in respect of, or related to the applicable derivatives contract and (ii) the Settled Derivatives Claims shall represent the sole right of the claimant to any distributions from the applicable Chapter 11 Estate under, in respect of, or related to the applicable derivatives contract; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A to the Three Hundred Tenth Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 310: EXHIBIT 1 - SETTLED DERIVATIVES CLAIMS

		ASSERTED				MODIFIED	
	NAME	CLAIM #	FILED DATE	CHAPTER 11 ESTATE	CLASS	AMOUNT	AMOUNT
1	ATTORNEYS' LIABILITY ASSURANCE SOCIETY (BERMUDA) LTD. C/O AUGUSTUS ASSET MANAGERS LIMITED C/O 12 ST. JAMES'S PLACE LONDON, SW1A 1NX UNITED KINGDOM	22985	09/21/2009	Lehman Brothers Commercial Corporation	Unsecured	\$350,569.00	\$276,701.00
2	BROAD MARKET XL HOLDINGS LTD (IN OFFICIAL LIQUIDATION) ATTN: RICHARD FOGERTY ZOLFO COOPER PO BOX 1102 4TH FLOOR GRAND CAYMAN, KY1-1102 CAYMAN ISLANDS	36937	10/07/2009	Lehman Brothers Holdings Inc.	Unsecured	\$30,432,793.37*	\$19,500,000.00
3	BROAD MARKET XL HOLDINGS LTD (IN OFFICIAL LIQUIDATION) ATTN: RICHARD FOGERTY ZOLFO COOPER PO BOX 1102 4TH FLOOR GRAND CAYMAN, KY1-1102 CAYMAN ISLANDS	36938	10/07/2009	Lehman Brothers Special Financing Inc.	Unsecured	\$30,432,793.37*	\$19,500,000.00
4	CVI GVF (LUX) MASTER S.A.R.L. TRANSFEROR: POND VIEW CREDIT (MASTER), L.P. C/O CARVAL INVESTORS UK LTD ATTN: DAVID SHORT KNOWLE HILL PARK, FAIRMILE LANE SURREY, KT11 2PD UNITED KINGDOM	13312	09/16/2009	Lehman Brothers Special Financing Inc.	Unsecured	\$2,883,480.00	\$1,321,425.00

* - Indicates claim contains unliquidated and/or undetermined amounts

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 310: EXHIBIT 1 - SETTLED DERIVATIVES CLAIMS

	NAME	CLAIM #	FILED DATE	ASSERTED		CLASS	AMOUNT	MODIFIED
				CHAPTER 11 ESTATE				AMOUNT
5	CVI GVF (LUX) MASTER S.A.R.L. TRANSFEROR: LISPENARD STREET CREDIT (MASTER) LTD. C/O CARVAL INVESTORS UK LTD. ATTN: DAVID SHORT KNOWLE HILL PARK, FAIRMILE LANE SURREY, KT11 2PD UNITED KINGDOM	13758	09/16/2009	Lehman Brothers Special Financing Inc.		Unsecured	\$9,722,840.00	\$5,250,000.00
6	JULIUS BAER SICAV- LOCAL EMERGING BOND FUND C/O AUGUSTUS ASSET MANAGERS LIMITED ATTN: RICHARD CULL, LEGAL COUNSEL 12 ST. JAMES'S PLACE LONDON, SW1A 1NX UNITED KINGDOM	22990	09/21/2009	Lehman Brothers Commercial Corporation		Unsecured	\$17,684,225.00	\$15,526,971.00
7	NEWS AMERICA INCORPORATED C/O AUGUSTUS ASSET MANAGERS LIMITED ATTN: RICHARD CULL, LEGAL COUNSEL 12 ST. JAMES'S PLACE LONDON, SW1A 1NX UNITED KINGDOM	22987	09/21/2009	Lehman Brothers Commercial Corporation		Unsecured	\$522,631.00	\$441,840.00
8	PACIFICCORP RETIREMENT PLAN C/O AUGUSTUS ASSET MANAGERS LIMITED ATTN: RICHARD CULL, LEGAL COUNSEL 12 ST. JAMES'S PLACE LONDON, SW1A 1NX UNITED KINGDOM	22988	09/21/2009	Lehman Brothers Commercial Corporation		Unsecured	\$476,828.00	\$376,018.00

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 310: EXHIBIT 1 - SETTLED DERIVATIVES CLAIMS

				ASSERTED			MODIFIED
	NAME	CLAIM #	FILED DATE	CHAPTER 11 ESTATE	CLASS	AMOUNT	AMOUNT
9	PEOPLE'S BANK OF CHINA C/O STATE ADMINISTRATION OF FOREIGN EXCHANGE ATTN: MS. WAN TONGJUN & MR. CUI HAILIANG 3/F PING'AN MANSION 23 JINRONG STREET, XICHENG DISTRICT BEIJING, 100140 CHINA	12479	09/14/2009	Lehman Brothers Commercial Corporation	Unsecured	\$156,376,856.00	\$14,773,829.00
					TOTAL	\$248,883,015.74	\$76,966,784.00

EXHIBIT P
(Proposed Order – ECF No. 28430)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THREE HUNDRED ELEVENTH OMNIBUS
OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

Upon the three hundred eleventh omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Eleventh Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Derivatives Claims on the grounds that they assert claims for which LBHI, Lehman Brothers Special Financing Inc., Lehman Brothers OTC Derivatives Inc., and Lehman Brothers Commodity Services Inc. (together, the “Chapter 11 Estates”) have no liability, all as more fully described in the Three Hundred Eleventh Omnibus Objection to Claims; and due and proper notice of the Three Hundred Eleventh Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the claimants listed on Exhibit A attached to the Three Hundred Eleventh Omnibus Objection to

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Eleventh Omnibus Objection to Claims.

Claims; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and the Court having found and determined that the relief sought in the Three Hundred Eleventh Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Three Hundred Eleventh Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Eleventh Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the Plan Administrator has adjourned *sine die* the Three Hundred Eleventh Omnibus Objection to Claims with respect to the claims listed on Exhibit 2 annexed hereto; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the Three Hundred Eleventh Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all

matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 311: EXHIBIT 1 - NO LIABILITY DERIVATIVES CLAIMS

	NAME	CASE NUMBER	CHAPTER 11 ESTATE	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	C.V.I G.V.F. (LUX) MASTER S.A.R.L. (UK) TRANSFEROR: GOOD STEWARD TRADING COMPANY SPC C/O CARVAL INVESTORS UK LIMITED KNOWLE HILL PARK, FARIMILE LANE COBHAM, SURREY, KT11 2PD UNITED KINGDOM	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/14/2009	12027	\$21,763.90	No Liability Claim - Derivative
2	CVI GVF (LUX) MASTERS S.A.R.L. TRANSFEROR: STAPLE STREET AVIATION (MASTER) LP C/O CARVAL INVESTORS UK LTD. ATTN: DAVID SHORT KNOWLE HILL PARK, FAIRMILE LANE SURREY, KT11 2PD UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/16/2009	13751	\$9,932.00	No Liability Claim - Derivative
3	CVI GVF (LUX) MASTER S.A.R.L. TRANSFEROR: STAPLE STREET AVIATION (MASTER) LP C/O CARVAL INVESTORS UK LTD ATTN: DAVID SHORT KNOWLE HILL PARK, FAIRMILE LANE SURREY, KT11 2PD UNITED KINGDOM	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/16/2009	13752	\$9,932.00	No Liability Claim - Derivative
4	INTRALOT S.A. ATTN: CHRIS MISTRIOTIS 64, KIFISSIAS AVE. & 3, PREMETIS STR. ATHENS, 15 125 GREECE	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	27536	\$73,000.00*	No Liability Claim - Derivative
5	MARANATHA BAPTIST BIBLE COLLEGE ATTN: MARK STEVENS 745 WEST MAIN STREET WATERTOWN, WI 53094	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	24623	Undetermined	No Liability Claim - Derivative

* - Indicates claim contains unliquidated and/or undetermined amounts

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 311: EXHIBIT 1 - NO LIABILITY DERIVATIVES CLAIMS

	NAME	CASE NUMBER	CHAPTER 11 ESTATE	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
6	MARANATHA BAPTIST BIBLE COLLEGE ATTN: MARK STEVENS 745 WEST MAIN STREET WATERTOWN, WI 53094	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	24624	Undetermined	No Liability Claim - Derivative
7	PARKING AUTHORITY OF THE CITY OF HAWTHORNE, CA ATTN: JAG PATHIRANA 4455 WEST 16TH STREET HAWTHORNE, CA 90250	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/16/2009	13890	Undetermined	No Liability Claim - Derivative
8	SUPERIOR ENERGY SERVICES INC ATTN: WILLIAM B. MASTERS 1105 PETERS ROAD HARVEY, LA 70058	08-13893 (JMP)	Lehman Brothers OTC Derivatives Inc.	09/22/2009	31962	Undetermined	No Liability Claim - Derivative
9	U.S. BANK NATIONAL ASSOCIATION CORPORATE TRUST SERVICES ATTN: TIMOTHY PILLAR, VP EP-MN-WS1D, 60 LIVINGSTON AVENUE ST. PAUL, MN 55107-2292	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	31028	Undetermined	No Liability Claim - Derivative
TOTAL						\$114,627.90	

Exhibit 2

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 311: EXHIBIT 2 - NO LIABILITY DERIVATIVES CLAIMS - ADJOURNED OBJECTIONS

	NAME	CASE NUMBE R	CHAPTER 11 ESTATE	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 38 ATTN: BRIAN WHALEY 825 THIRD AVENUE NEW YORK, NY 10022	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17108	\$182,062.50*	No Liability Claim - Derivative
2	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 38 ATTN: BRIAN WHALEY 825 THIRD AVENUE NEW YORK, NY 10022	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17109	\$182,062.50*	No Liability Claim - Derivative
3	CIFG SERVICES, INC., 850 3RD AVE FL 10 NEW YORK, NY 10022-7221	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17110	\$12,214.32*	No Liability Claim - Derivative
4	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 15 850 3RD AVE FL 10 NEW YORK, NY 10022-7221	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17111	\$12,214.32*	No Liability Claim - Derivative
5	CIFG SERVIES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 16 850 3RD AVE FL 10 NEW YORK, NY 10022-7221	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17112	\$9,379.29*	No Liability Claim - Derivative
6	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 16 850 3RD AVE FL 10 NEW YORK, NY 10022-7221	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17145	\$9,379.29*	No Liability Claim - Derivative

* - Indicates claim contains unliquidated and/or undetermined amounts

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 311: EXHIBIT 2 - NO LIABILITY DERIVATIVES CLAIMS - ADJOURNED OBJECTIONS

	NAME	CASE NUMBE R	CHAPTER 11 ESTATE	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
7	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 39 850 3RD AVE FL 10 NEW YORK, NY 10022-7221	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17146	\$165,875.00*	No Liability Claim - Derivative
8	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 39 850 3RD AVE FL 10 NEW YORK, NY 10022-7221	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17147	\$165,878.00*	No Liability Claim - Derivative
9	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 83 850 3RD AVE FL 10 NEW YORK, NY 10022-7221	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17148	\$151,999.99*	No Liability Claim - Derivative
10	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 83 850 3RD AVE FL 10 NEW YORK, NY 10022-7221	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17149	\$151,999.99*	No Liability Claim - Derivative
11	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 37 ATTN: BRIAN WHALEY 825 THIRD AVENUE NEW YORK, NY 10022	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17150	\$25,582.25*	No Liability Claim - Derivative
12	CIFG SERVICES, INC., AS TRUSTEE OF NEW GENERATION FUNDING TRUST 37 ATTN: BRIAN WHALEY 825 THIRD AVENUE NEW YORK, NY 10022	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	17151	\$25,582.25*	No Liability Claim - Derivative

* - Indicates claim contains unliquidated and/or undetermined amounts

IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 311: EXHIBIT 2 - NO LIABILITY DERIVATIVES CLAIMS - ADJOURNED OBJECTIONS

	NAME	CASE NUMBE R	CHAPTER 11 ESTATE	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
13	STATE OF LOUISIANA, DEPARTMENT OF TREASURY TOBACCO SETTLEMENT FINANCING CORPORATION C/O LOUISIANA DEPARTMENT OF JUSTICE BENJAMIN A. HUXEN II, ASST ATTORNEY GENERAL P.O. BOX 94005 BATON ROUGE, LA 70804-9005	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	10/21/2009	42907	\$10,000,000.00	No Liability Claim - Derivative
14	STATE OF LOUISIANA, DEPARTMENT OF TREASURY TOBACCO SETTLEMENT FINANCING CORPORATION C/O LOUISIANA DEPARTMENT OF JUSTICE BENJAMIN A. HUXEN II, ASST ATTORNEY GENERAL P.O. BOX 94005 BATON ROUGE, LA 70804-9005	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/21/2009	42908	\$10,000,000.00	No Liability Claim - Derivative
15	U.S. BANK NATIONAL ASSOCIATION CORPORATE TRUST SERVICES ATTN: TIMOTHY PILLAR, VP EP-MN-WS1D, 60 LIVINGSTON AVENUE ST. PAUL, MN 55107-2292	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	31059	Undetermined	No Liability Claim - Derivative
16	U.S. BANK NATIONAL ASSOCIATION CORPORATE TRUST SERVICES ATTN: TIMOTHY PILLAR, VP EP-MN-WS1D, 60 LIVINGSTON AVENUE ST. PAUL, MN 55107-2292	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	31060	Undetermined	No Liability Claim - Derivative
TOTAL						\$21,094,229.70	

EXHIBIT Q
(Proposed Order – ECF No. 28431)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THE THREE HUNDRED TWELFTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the three hundred twelfth omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Twelfth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking disallowance and expungement of the No Liability Claims to the extent that they assert claims for which the applicable Chapter 11 Estates do not have any liability, all as more fully described in the Three Hundred Twelfth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Twelfth Omnibus Objection to Claims having been provided; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Twelfth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Three

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Twelfth Omnibus Objection to Claims.

Hundred Twelfth Omnibus Objection to Claims establish just cause for the relief granted herein;
and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Twelfth Omnibus
Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims
listed on Exhibit 1 annexed hereto are disallowed and expunged, with prejudice, to the extent set
forth therein; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all
matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 312: EXHIBIT 1 - NO LIABILITY CLAIMS

Name of Claimant	Claim Number	Claim Amount	Reason for Disallowance	Notes
EXCALIBUR FUNDING NO. 1 PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED ATTN: MARTIN MCDERMOTT/MARK FILER THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	28809	Undetermined	No Liability Claim	No liability pursuant to Clause 2.3(a)(ii) of the settlement agreement.
EXCALIBUR FUNDING NO. 1 PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED ATTN: MARTIN MCDERMOTT/MARK FILER THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	28810	Undetermined	No Liability Claim	No liability pursuant to Clause 2.3(a)(ii) of the settlement agreement.
EXCALIBUR FUNDING NO. 1 PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED ATTN: MARTIN MCDERMOTT/MARK FILER THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	28838	Undetermined	No Liability Claim	No liability pursuant to Clause 2.3(a)(ii) of the settlement agreement.

LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 312: EXHIBIT 1 - NO LIABILITY CLAIMS

Name of Claimant	Claim Number	Claim Amount	Reason for Disallowance	Notes
EXCALIBUR FUNDING NO. 1 PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED ATTN: MARTIN MCDERMOTT/MARK FILER THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	28839	Undetermined	No Liability Claim	No liability pursuant to Clause 2.3(a)(ii) of the settlement agreement.
EXCALIBUR FUNDING NO. 1 PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED ATTN: MARTIN MCDERMOTT/MARK FILER THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	28840	Undetermined	No Liability Claim	No liability pursuant to Clause 2.3(a)(ii) of the settlement agreement.
EXCALIBUR FUNDING NO. 1 PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED ATTN: MARTIN MCDERMOTT/MARK FILER THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	28841	Undetermined	No Liability Claim	No liability pursuant to Clause 2.3(a)(ii) of the settlement agreement.

LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 312: EXHIBIT 1 - NO LIABILITY CLAIMS

Name of Claimant	Claim Number	Claim Amount	Reason for Disallowance	Notes
EXCALIBUR FUNDING NO. 1 PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED ATTN: MARTIN MCDERMOTT/MARK FILER THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	28842	Undetermined	No Liability Claim	No liability pursuant to Clause 2.3(a)(ii) of the settlement agreement.
EXCALIBUR FUNDING NO. 1 PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED ATTN: MARTIN MCDERMOTT/MARK FILER THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	28843	Undetermined	No Liability Claim	No liability pursuant to Clause 2.3(a)(ii) of the settlement agreement.
EXCALIBUR FUNDING NO. 1 PLC C/O WILMINGTON TRUST SP SERVICES (LONDON) LIMITED ATTN: MARTIN MCDERMOTT/MARK FILER THIRD FLOOR 1 KING'S ARMS YARD LONDON, EC2R 7AF UNITED KINGDOM	28844	Undetermined	No Liability Claim	No liability pursuant to Clause 2.3(a)(ii) of the settlement agreement.
TOTAL		\$0.00		

EXHIBIT R
(Proposed Order – ECF No. 28438)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THE
THREE HUNDRED FIFTEENTH OMNIBUS
OBJECTION TO CLAIMS (EMPLOYMENT-RELATED CLAIMS)**

Upon the three hundred fifteenth omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Fifteenth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking disallowance and expungement of the Employment-Related Claims to the extent that they assert claims for which LBHI has no liability or seeking to reclassify certain of the Employment-Related Claims as common equity interests, all as more fully described in the Three Hundred Fifteenth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Fifteenth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief requested in the Three Hundred Fifteenth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and

¹ Terms not defined herein shall have the same meaning ascribed to them in the Three Hundred Fifteenth Omnibus Objection to Claims.

factual bases set forth in the Three Hundred Fifteenth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Fifteenth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, the portions of the claims listed on Exhibit 1 annexed hereto under the heading “*Amount to be Disallowed*” are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the portions of the claims listed on Exhibit 1 annexed hereto under the heading “*Amount to be Reclassified as Equity Interest*” are reclassified as equity interests having the same priority as, and no greater priority than, common stock interests in LBHI; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Three Hundred Fifteenth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto, and (ii) the portion of any Employment-Related Claim that is not the subject of the Three Hundred Fifteenth Omnibus Objection to Claims; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 315: EXHIBIT 1 - EMPLOYMENT-RELATED CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNT TO BE RECLASSIFIED AS EQUITY INTEREST	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 BAKER, BRIDGET L.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	31642	Undetermined	None	Undetermined	Undetermined
2 BHUTANI, SARABJIT S.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	8/28/2009	9634	\$2,879,070.04	\$396,353.98	None	\$2,482,716.06
3 CAMPBELL, ROBERT H	08-13555 (JMP)	Lehman Brothers Holdings Inc.	8/7/2009	7596	\$1,109,942.27 *	\$769,184.27	None	\$340,758.00
4 CHAMBERLAIN, DANIELLE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	29542	\$57,500.00	\$20,000.00	\$7,500.00	\$30,000.00
5 CHANG, ALFREDO Y.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	29576	\$130,965.20	None	\$6,500.00	\$124,465.20
6 CHISHOLM, RUPERT F.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	27571	\$10,950.00 *	Undetermined	None	\$10,950.00
7 CONTI, ANGELA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	30350	\$8,000.00 *	\$8,000.00	None	Undetermined
8 D'AMADEO, JOSEPH G	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	19076	\$7,483,695.80	\$195,962.92	None	\$7,287,732.88
9 DELLARUSSO, RICHARD J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	1/28/2009	2112	\$219,545.52	\$106,668.97	None	\$112,876.55
10 DEWAN, JOAN M	08-13555 (JMP)	Lehman Brothers Holdings Inc.	7/20/2009	5675	\$22,789.76	\$15,048.76	None	\$7,741.00
11 DISABATO, KENNETH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	30411	\$6,000.00 *	\$6,000.00	None	Undetermined
12 FENNELL, CAROLE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	26580	Undetermined	None	Undetermined	Undetermined

OMNIBUS OBJECTION 315: EXHIBIT 1 - EMPLOYMENT-RELATED CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNT TO BE RECLASSIFIED AS EQUITY INTEREST	AMOUNTS NOT SUBJECT TO THIS OBJECTION
13 FLANNERY, JOSEPH J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	5/29/2009	4642	\$1,271,636.67	\$1,074,456.67	None	\$197,180.00
14 GHOSH, SHINJIT	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	28650	Undetermined	Undetermined	None	Undetermined
15 GIESE, JOHN T.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	34212	\$4,925.00	\$4,000.00	None	\$925.00
16 GOLDBERG, DANIEL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	18188	\$14,068.31	\$9,192.31	None	\$4,876.00
17 GOLLIN, MARK D.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/17/2009	15134	\$792,128.00	\$242,128.00	\$50,000.00	\$500,000.00
18 HABER, SANFORD A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	22132	\$183,350.85 *	\$60,000.00	None	\$123,350.85
19 HAHN-COLBERT, SANDRA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/24/2009	34726	\$750,000.00	\$750,000.00	None	None
20 ICASIANO, SERAFIN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	27948	\$5,445.46	\$2,788.46	None	\$2,657.00
21 KAMENOFF, NICK N	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	24883	\$8,829.66	\$3,482.60	None	\$5,347.06
22 KLINGER, JEFFREY M.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	7/27/2009	6256	\$500,000.00	\$364,077.06	None	\$135,922.94
23 KRASNOPOLSKY, DAVID	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	27297	\$25,832.18	\$10,596.18	None	\$15,236.00
24 KUN, WILLIAM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12/19/2008	1395	\$58,058.46 *	\$58,058.46	None	Undetermined

OMNIBUS OBJECTION 315: EXHIBIT 1 - EMPLOYMENT-RELATED CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNT TO BE RECLASSIFIED AS EQUITY INTEREST	AMOUNTS NOT SUBJECT TO THIS OBJECTION
25 LARIT, KEITH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	28275	\$408,328.42	\$194,528.82	None	\$213,799.60
26 LOPRETE, BECKY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	27356	\$11,806.00	\$4,375.00	None	\$7,431.00
27 LOZANO, ROSA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	27359	\$6,802.81	\$4,179.81	None	\$2,623.00
28 MARTYN, LYNETTE	08-13905 (JMP)	CES Aviation LLC	9/16/2009	13351	\$100,000.00 *	\$100,000.00	None	Undetermined
29 MONAHAN, MARIA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/23/2009	34563	\$5,450.00	None	\$5,450.00	None
30 MULLEN, MICHAEL J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	27599	\$354,417.72	\$196,206.67	None	\$158,211.05
31 NINEHAM, STEWART K.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	1/26/2009	1951	\$1,091,529.50	\$886,886.50	None	\$204,643.00
32 PATEL, SHAILY B.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	26133	\$714.80	\$232.80	None	\$482.00
33 PENCU, RALUCA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	31420	\$110,000.00	\$82,000.00	\$5,000.00	\$23,000.00
34 PRANAITIS, JEFFREY D.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/16/2009	13891	\$2,093,269.00 *	\$2,093,269.00	None	Undetermined
35 PRESTON, GERAINT N	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/19/2009	19576	\$203,600.00	\$118,223.00	None	\$85,377.00
36 RAHMAN, MOHAMMED M	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	30740	\$21,251.00	\$4,000.00	None	\$17,251.00

OMNIBUS OBJECTION 315: EXHIBIT 1 - EMPLOYMENT-RELATED CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNT TO BE RECLASSIFIED AS EQUITY INTEREST	AMOUNTS NOT SUBJECT TO THIS OBJECTION
37 RODRIGUEZ, NANCY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12/19/2008	1392	\$1,741.75 *	\$1,741.75	None	Undetermined
38 RODRIGUEZ, NANCY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	22265	\$1,119.16 *	\$1,119.16	None	Undetermined
39 ROSS, MEREDITH H	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/19/2009	19588	\$10,000.00 *	\$10,000.00	None	Undetermined
40 RUSSELL, MARK	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	31225	\$2,422,363.00	\$300,957.00	None	\$2,121,406.00
41 SHEK-FREEDMAN, ADA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	27357	\$2,247.00	\$1,442.00	None	\$805.00
42 SHLIMON, MICHELLE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	34213	\$5,675.00	\$4,000.00	None	\$1,675.00
43 SINN, ADAM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	24655	\$6,101,200.00	\$6,000,000.00	None	\$101,200.00
44 SIU, RICHARD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	30364	\$88,757.17	\$2,522.17	None	\$86,235.00
45 STEINBERG, DARRYL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	31185	\$456,825.00	\$111,538.00	None	\$345,287.00
46 TAM, JACKSON	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	30444	\$4,526.92 *	\$4,526.92	None	Undetermined
47 TAYLOR,CHRISTOPHER C	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/24/2009	34879	\$28,888.89	\$28,888.89	None	None
48 WALESCH, JAY E	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	23899	\$80,258.46	\$68,908.00	\$6,533.46	\$4,817.00

OMNIBUS OBJECTION 315: EXHIBIT 1 - EMPLOYMENT-RELATED CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNT TO BE RECLASSIFIED AS EQUITY INTEREST	AMOUNTS NOT SUBJECT TO THIS OBJECTION
49 WALSH, MARK	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	29624	Undetermined	Undetermined	Undetermined	Undetermined
50 WATERS, ANDREW THOMAS	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/19/2009	19623	\$4,617.16	\$3,453.16	None	\$1,164.00
51 WRIGHT, T S	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	25605	\$350,000.00 *	\$350,000.00	None	Undetermined
52 YOSHIMURA, ROBIN K.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	30552	\$160,689.00	\$66,689.00	None	\$94,000.00
TOTAL					\$29,668,810.94	\$14,735,686.29	\$80,983.46	\$14,852,141.19

EXHIBIT S
(Proposed Order – ECF No. 28441)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**ORDER GRANTING THREE HUNDRED SEVENTEENTH OMNIBUS
OBJECTION TO CLAIMS (NO LIABILITY LBL EMPLOYEE CLAIMS)**

Upon the three hundred seventeenth omnibus objection to claims, dated June 4, 2012 (the “Three Hundred Seventeenth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking the disallowance and expungement of the No Liability LBL Employee Claims on the basis that LBHI has no liability for such claims, all as more fully described in the Three Hundred Seventeenth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Seventeenth Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the claimants listed on Exhibit A attached to the Three Hundred Seventeenth Omnibus Objection to Claims; and (vi) all other parties entitled to notice in accordance with the procedures set forth in

¹ Terms not defined herein shall have the same meaning ascribed to them in the Three Hundred Seventeenth Omnibus Objection to Claims.

the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and the Court having found and determined that the relief sought in the Three Hundred Seventeenth Omnibus Objection to Claims is in the best interests of LBHI, its estate, its creditors, and all parties in interest and that the legal and factual bases set forth in the Three Hundred Seventeenth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Seventeenth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the Plan Administrator has adjourned to August 23, 2012 (or as may be further adjourned by the Plan Administrator) the Three Hundred Seventeenth Omnibus Objection to Claims with respect to the claim listed on Exhibit 2 annexed hereto; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the Three Hundred Seventeenth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all

matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 317: EXHIBIT 1 - NO LIABILITY LBL EMPLOYEE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	GREENWAY, LISA K 161 WATLING STREET PARK ST VILLAGE ST ALBANS, AL2 2NZ UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	16285	\$93,876.00	No Liability - LBL Employee
2	MARNEY, LESLEY N POPLAR GRANGE 48 CLERKE DRIVE KEMSLEY KENT SITTINGBOURNE, ME102RY UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/14/2009	12047	\$166,115.00	No Liability - LBL Employee
3	REINBACHER, RENE STEINPLEISER STR. 59 ZWICKAU, SN 08060 GERMANY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	32236	\$139,774.00*	No Liability - LBL Employee
4	SAUNDERS, MARK A. 140 BEECHWOOD AVENUE ST ALBANS, HERTS, AL1 4XY UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/16/2009	14396	\$84,000.00	No Liability - LBL Employee
5	WEST, DAVID 45 LEICESTER ROAD WANSTEAD LONDON, E112DW UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/17/2009	15205	\$138,598.70	No Liability - LBL Employee
TOTAL						\$622,363.70	

Exhibit 2

OMNIBUS OBJECTION 317: EXHIBIT 2 - NO LIABILITY LBL EMPLOYEE CLAIMS - ADJOURNED OBJECTIONS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1 GREZO,CHARLOTTE BRERETON 26 HURON ROAD TOOTING LONDON, GT LON, SW17 8RB UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/15/2009	12755	\$1,175,570.00	No Liability - LBL Employee
TOTAL					\$1,175,570.00	

EXHIBIT T
(Proposed Order – ECF No. 28442)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THREE HUNDRED EIGHTEENTH
OMNIBUS OBJECTION TO CLAIMS (PARTNERSHIP CLAIMS)**

Upon the three hundred eighteenth objection to claims, dated June 4, 2012 (the “Three Hundred Eighteenth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking disallowance and expungement of the Partnership Claims on the basis that LBHI has no liability for such claims, all as more fully described in the Three Hundred Eighteenth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Eighteenth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief requested in the Three Hundred Eighteenth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Three Hundred Eighteenth Omnibus

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Eighteenth Omnibus Objection to Claims.

Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Three Hundred Eighteenth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that the hearing on the Three Hundred Eighteenth Omnibus Objection to Claims is adjourned to August 23, 2012 with respect to the claims listed on Exhibit 2 annexed hereto; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Three Hundred Eighteenth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2012
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 318: EXHIBIT 1 - PARTNERSHIP CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL FILED CLAIM AMOUNT	TOTAL CLAIM DOLLARS SUBJECT TO OBJECTION	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 ARTICLE 7TH TRUST U/W/O SHERMAN R. LEWIS, JR.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	19084	\$3,279.00	\$3,279.00	NONE
2 ARTICLE 7TH TRUST U/W/O SHERMAN R. LEWIS, JR.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	19085	\$37,232.00	\$37,232.00	NONE
3 ARTICLE 7TH TRUST U/W/O SHERMAN R. LEWIS, JR.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	19086	\$16,858.00	\$16,858.00	NONE
4 ARTICLE 7TH TRUST U/W/O SHERMAN R. LEWIS, JR.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	19088	\$9,703.00	\$9,703.00	NONE
5 ARTICLE 7TH TRUST U/W/O SHERMAN R. LEWIS, JR.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	19089	\$962.00	\$962.00	NONE
6 BAKER, BRIDGET L.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	31642	Undetermined	Undetermined	Undetermined
7 BERKENFELD, STEVEN L	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	16258	\$1,348,079.00	\$1,348,079.00	NONE
8 CIMAGLIA, ANTHONY M.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	8/5/2009	7382	\$9,539.00	\$9,539.00	NONE
9 COPELAND, JOHN W.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	32744	\$206,758.00	\$206,758.00	NONE
10 EINHORN, HOWARD G., III	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/23/2009	44705	\$9,586.00	\$9,586.00	NONE
11 FLANNERY, JOSEPH J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	5/29/2009	4642	\$1,271,636.67	\$197,180.00	\$1,074,456.67
12 GABBAY, MARK	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/10/2009	11078	\$859,761.00	\$859,761.00	NONE
13 GOODMAN, JEFFREY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	30464	\$403,609.40	\$403,609.40	NONE
14 HANSELL, PETER	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/17/2009	14747	\$3,252,616.06	\$475,438.00	\$2,777,178.06

OMNIBUS OBJECTION 318: EXHIBIT 1 - PARTNERSHIP CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL FILED CLAIM AMOUNT	TOTAL CLAIM DOLLARS SUBJECT TO OBJECTION	AMOUNTS NOT SUBJECT TO THIS OBJECTION
15 HAYAT, CLAUDE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	21344	\$159,918.00	\$159,918.00	NONE
16 HENRY, EMIL W. JR.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	5/29/2009	4654	Undetermined	Undetermined	NONE
17 HOY, ROBERT J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	28227	\$65,000.00*	\$65,000.00	NONE
18 KENNEY, ARTHUR J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/15/2009	40526	\$174,237.93	\$174,237.93	NONE
19 MEJEAN, PAUL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	23867	\$962.00	\$962.00	NONE
20 MEJEAN, PAUL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	23868	\$3,274.00	\$3,274.00	NONE
21 MIDDAGH, ROY G.	08-13905 (JMP)	CES Aviation LLC	8/5/2009	7409	\$8,971.90	\$8,971.90	NONE
22 MIKULICH, RAYMOND C.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	23842	Undetermined	Undetermined	NONE
23 MIKULICH, RAYMOND C.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	23846	Undetermined	Undetermined	NONE
24 MIKULICH, RAYMOND C.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	23847	Undetermined	Undetermined	NONE
25 MIKULICH, RAYMOND C.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	23848	Undetermined	Undetermined	NONE
26 MONELLO, MARIO A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/19/2009	19644	\$7,325.00	\$7,325.00	NONE
27 MURPHY, PAT	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/18/2009	17259	\$3,045.00	\$3,045.00	NONE
28 NINEHAM, STEWART K.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	1/26/2009	1951	\$1,091,529.50	\$204,643.00	\$886,886.50

IN RE: LEHMAN BROTHERS HOLDINGS INC., et al, CASE NO. 08-13555 (JMP)
OMNIBUS OBJECTION 318: EXHIBIT 1 - PARTNERSHIP CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL FILED CLAIM AMOUNT	TOTAL CLAIM DOLLARS SUBJECT TO OBJECTION	AMOUNTS NOT SUBJECT TO THIS OBJECTION
29 PETERSEN, JACK	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	30343	\$156,918.00	\$156,918.00	NONE
30 PUSKULDJIAN, PAUL A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	7/22/2009	5856	\$7,820.00	\$7,820.00	NONE
31 ROSEN, LEONARD G.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	33577	\$126,804.63	\$126,804.63	NONE
32 STIGUM, ERIK P	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/4/2009	10432	\$14,000.00	\$14,000.00	NONE
33 TOSCANI, EDOARDO	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	25357	\$4,593,111.00	\$52,771.00	\$4,540,340.00
34 VARNI, DAMIAN M.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	8/25/2009	9358	\$300,000.00	\$300,000.00	NONE
35 WALLACE, WILLIAM A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/16/2009	13738	\$1,250.00	\$1,250.00	NONE
36 WALSH, MARK	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	29624	Undetermined	Undetermined	Undetermined
37 WARD, PETER	08-13555 (JMP)	Lehman Brothers Holdings Inc.	8/31/2009	9915	\$1,966,452.39	\$88,152.00	\$1,878,300.00
38 WECKER, JEFFREY	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	29718	Undetermined	Undetermined	Undetermined
39 WEHRLE, MICHAEL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/17/2009	15152	\$1,424,406.77	\$1,424,406.77	NONE
40 WINFREY, GRANTHAM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/3/2009	10211	\$750,000.00	\$750,000.00	NONE
41 WRIGHT, T S	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/21/2009	25605	Undetermined	Undetermined	Undetermined
TOTAL					\$18,284,645.25	\$7,127,483.63	\$11,157,161.23

Exhibit 2

OMNIBUS OBJECTION 318: EXHIBIT 2 - ADJOURNED PARTNERSHIP CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL FILED CLAIM AMOUNT	TOTAL CLAIM DOLLARS SUBJECT TO OBJECTION	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 MONAHAN, BRIAN W.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	6/1/2009	4706	\$500,000.00	\$500,000.00	NONE
2 MOORE, CHARLES C.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	34234	\$10,780,803.79	\$8,852,036.67	\$1,928,767.12
3 O'BRIEN, BARRY J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	31941	\$19,410.00	\$19,410.00	NONE
4 PARK, EDWARD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	9/22/2009	34235	\$10,780,803.79	\$8,852,036.67	\$1,928,767.12
TOTAL					\$22,081,017.58	\$18,223,483.34	\$3,857,534.24